

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
Lisa J. Cisneros (State Bar No. 251473)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Joseph R. Saveri (State Bar No. 130064)
Lisa J. Leebove (State Bar No. 186705)
James G. Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM
505 Montgomery Street, Suite 625
San Francisco, CA 94111
Telephone: (415) 500-6800
Facsimile: (415) 500-6803

Interim Co-Lead Counsel for Plaintiff Class

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL, PURSUANT TO
CIVIL LOCAL RULE 79-5(d), EXHIBIT
A TO THE MARCH 1, 2013 JOINT
DISCOVERY STATUS REPORT**

Pursuant to Local Rules 7-11 and 79-5(d), Plaintiffs move to seal Exhibit A to the March 1, 2013 Joint Discovery Status Report.

None of the information at issue was designated confidential by Plaintiffs. Instead, Defendant Google designated the entire transcripts of both Shona Brown and Alan Eustace Highly Confidential, Attorneys Eyes Only under the terms of the Stipulated Protective Order (Modified by the Court), (Dkt. 107). Therefore, the requirements of Local Rule 79-5(d) apply.

Pursuant to Local Rule 79-5(d), the proposed redacted version of Exhibit A to the Status Report has been attached as Exhibit 1 to this motion, served and lodged with the Court. Pursuant to Local Rule 79-5(c)(4) and the Court's January 11, 2013 Order (Dkt. 269), attached hereto as Exhibit 2, and lodged with the Court, is Exhibit A to the Status Report with the proposed redactions highlighted in Yellow. Pursuant to Local Rule 79-5(c)(5), Plaintiffs have lodged and served redacted versions of Exhibit A.

Respectfully submitted,

Dated: March 1, 2013

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Lisa J. Cisneros
Lisa J. Cisneros

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
Lisa J. Cisneros (State Bar No. 251473)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956.1000
Facsimile: (415) 956.1008

Joseph R. Saveri (State Bar No. 130064)
Lisa J. Leebove (State Bar No. 186705)
James G. Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM
505 Montgomery Street, Suite 625
San Francisco, CA 94111
Telephone: (415) 500-6800
Facsimile: (415) 500-6803

Interim Co-Lead Counsel for Plaintiff Class